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HAZARDOUS WASTE
FACILITIES BRANCH

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

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Deputy Director

Responsible Party Remedial Action

SEP 26 1988

Mr. Klaus Meinssen
Vice President, Administration
Daniel Products Company
Division of Synres Chemical Corp.
400 Claremont Avenue
Jersey City, NJ 07304

Dear Mr. Meinssen:

RE: Delisting of Daniel Products Company, 400 Claremont Avenue, Jersey City, Hudson County, from Treatment, Storage and Disposal Status to Generator Only Status, EPA ID No. NJD 001 340 686, (NJ Project No. CP-87-16)

This is in reference to Daniel Products Company's (the facility) submittal dated July 22, 1988. This submittal includes written certification of closure of an indoor hazardous waste container storage area at the above referenced facility by the owner or operator and by an independent professional engineer, Mr. Fred Ellerbusch, New Jersey Professional Engineer, License Number 26302. These certifications document that all closure plan procedures have been carried out in accordance with the closure plan dated August 27, 1987, which was approved by the Bureau of Hazardous Waste Engineering (the Bureau) on October 7, 1987 and the acceptable decontamination level was amended by the Bureau on June 7, 1988. The closure plan was submitted by the facility for the purpose of delisting from treatment, storage and disposal (TSD) status to generator only status.

Based upon the review by the Bureau, affected state agencies and closure certification inspection performed on August 6, 1988 by a representative of the Department's Metro Bureau of Enforcement, the Bureau of Hazardous Waste Engineering accepts the closure certification for the facility's hazardous waste container storage area.

Daniel Products Company filed a Part A permit application on November 17, 1980 with the USEPA for S01 (storage of hazardous waste in containers) hazardous waste activity with a process design capacity of 1,100 gallons. On May 5, 1987, the facility requested delisting from TSD to Generator Only status.

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Based on the documentation of closure of this S01 activity as described above, Daniel Products Company's facility which is identified by the USEPA identification number

NJD 001 340 686

is excluded from permitting requirements as a hazardous waste treatment, storage or disposal facility under N.J.A.C. 7:26-1 et seq. subject to conduct of on-site generated hazardous waste container storage in accordance with N.J.A.C. 7:16-9.3(a) as follows:

- (a) All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
- (b) The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
- (c) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. While being accumulated on-site, each container shall be clearly labeled or marked with the words "Hazardous Waste" and labeled in accordance with 49 CFR 172.304.
- (d) The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

This written acknowledgement of the exclusion of the facility from the New Jersey Department of Environmental Protection's list of existing hazardous waste TSD facilities is based expressly on the review of the aforementioned correspondence and site inspection. This letter makes no claim as to the extent and physical conditions of the actual hazardous waste activities presently occurring at the site mentioned above.

As a result of this delisting, Daniel Products Company's closure bond, to meet TSD requirements for the S01 activity is no longer required and may be cancelled as per your request.

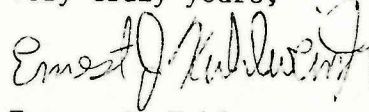
The issuance of this delisting letter by the Department does not indicate, or imply, and should not be construed as a waiver of any requirements pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (90) days to the Bureau of Ground Water Quality Management, CN 029, Trenton, New Jersey 08625. Applications may be obtained by calling (609) 292-0424.

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Daniel Products Company's facility is no longer included in DEP's list of existing facilities (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-9 et seq. for "existing facilities", which would include the TSD facility annual report. It is the facility's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1 et seq.

If you have any questions, please call Paul Mander of my staff at (609) 292-9880.

Very truly yours,



Ernest J. Kuhlwein, Jr., Chief
Bureau of Hazardous Waste Engineering

EP43/abl

c: Barry Tornick, USEPA, Region II
Yacoub E. Yacoub, Chief, BME

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FOLDER: LXMMCB